



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

September 15, 2009

John Allen, Forest Supervisor  
C/O Shane Jeffries, District Ranger  
1230 N.E. 3<sup>rd</sup> Street, Suite A-262  
Bend, Oregon 97701

**Subject: Comments on the Deadlog Vegetation Management Project**  
**EPA Project Number: 08-024-AFS**

Dear Mr. Allen:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Clean Air Act § 309, the US Environmental Protection Agency (EPA) has reviewed the Forest Service's (FS) Draft Environmental Impact Statement (DEIS) for the proposed **Deadlog Vegetation Management Project** (CEQ Number 20090253) on Deschutes National Forest in Deschutes County, Oregon.

The draft EIS analyzes potential environmental impacts of a proposal to conduct a variety of vegetation management activities in a 16,055-acre project area on Bend/Ft. Rock Ranger District of Deschutes National Forest near the town of Bend, Oregon. Current forest conditions indicate a need to reduce its susceptibility to insects, disease and fire disturbances, thus moving it toward a stable ecosystem. Analysis of the project's impacts to forest resources considered 3 alternative actions, including a *Preferred Alternative* (Alternative 3). Unlike Alternative 2, the Preferred Alternative would not include shelterwood and cable logging treatments, but would increase the treatment area by more than 500 acres and utilize biomass left out after thinning in older plantations for energy generation. All Action alternatives would require new access roads and an amendment to the Forest Plan to exempt the project from meeting the summer hiding cover standard for big game requirement, particularly deer that predominates the planning area.

EPA understands the risk that natural disturbance processes, including insects, disease and fire, may pose to valuable forest resources. Thus, we support many of the vegetation management strategies identified under the Preferred Alternative, which are put forward to reduce the risk of loss of forest. Overall, the DEIS also includes a good discussion of many of the points raised in our scoping comments for the project, including identification of affected resources and values, analysis of the project's potential impacts, mitigation measures and Best Management Practices (BMPs) to offset and reduce the impacts, and effectiveness monitoring. We also appreciate plans to obliterate and rehabilitate access roads after the project, and to close and decommission some existing roads.

Since there are no waterways, endangered or threatened species, or roadless areas in the planning area (p. 6), our primary concern with implementing the project as proposed relate to its impacts to air quality. We recommend that additional air quality information be included in the



final EIS and that FS coordinate with the Oregon Department of Environmental Quality (ODEQ) to ensure that the air quality standards will be met by the project. We are also offering the following comments that we hope will be useful to you as you complete the NEPA analysis and prepare the final EIS for the project.

### **Air quality impacts**

The draft EIS indicates that smoke from prescribed burning activities alone would impact air quality, with emissions of more than 1,000 tons of PM<sub>2.5</sub> and PM<sub>10</sub> (p. 73). Also, air quality may be impacted due to invasive plant treatment activities, dust from road construction and site operations, regular traffic on dirt roads, emissions from vehicles, and cumulative impacts from surrounding activities such as agriculture and fire. We recommend the final EIS discuss existing ambient air conditions, National Ambient Air Quality Standards (NAAQS), and criteria pollutants non-attainment areas in the project area or vicinity. Also, the EIS should estimate air emissions from all sources, including prescribed fire, for the area and discuss the timeframe for release of these emissions over the lifespan of the project. For better protection of public health from air pollution exposure, EPA has set NAAQS for six principal pollutants or criteria pollutants (see <http://www.epa.gov/air/criteria.html>) that should be used to determine if emissions from the project would exceed the daily and annual standards. Should emissions resulting from the project exceed the standards, the final EIS should include measures to demonstrate that, if implemented, the project would comply with both state and federal air quality regulations.

Because the proposed project area is near the City of Bend with a population that may include sensitive groups, we recommend that the FS monitor air quality and take corrective action if air quality standards are not met. Such monitoring should be tailored to local conditions because localized air quality impacts can be substantial, while the project area and surrounding environment might show compliance with the NAAQS. We recommend that the FS partner with local, state, and federal health departments to determine appropriate and effective mitigation measures to address potential adverse health impacts due to increased air pollution, especially in cases of potential acute and chronic impacts.

### **Road closure and decommissioning**

The draft EIS indicates that because of the project, over 17,00 and 21,000 miles would be closed and decommissioned, respectively. We are pleased that roads would be closed and decommissioned. Road closures and decommissions can range from administrative (signage or barricading at the road entrance to prevent off-road vehicles from entering) to obliterating, revegetating, and stabilizing the road to reduce the risk of mass wasting and to improve wildlife habitats. In the past, closing a road has typically meant removing access while decommissioning has referred to taking the road out of useful service and re-vegetating towards the natural state. EPA supports road closure and decommissioning methods that best address resource damage and are consistent with maintenance and enforcement funding expectations.

We recommend that the final EIS be specific about plans for decommissioning and closing the roads. As an example, the final EIS should indicate whether all roads planned for

decommissioning would be tilled and replanted with native vegetation and monitored to prevent and control noxious weed infestations. It should also disclose when the proposed road decommissioning would be performed relative to the timing of other proposed project activities. Some road closures may also not be effective in barring off road vehicle and motorcycle passage. The EIS should describe the enforcement measures that will be used and the monitoring program that will be implemented to ensure that road closures are effective.

### **Coordination with Tribes**

The draft EIS indicates that the planning team met with tribes that may be affected by the project, but information related to issues discussed and outcomes of the meetings was not included in the draft EIS. We recommend the final EIS include that missing information and a discussion on how any issues raised would be addressed. Because the draft EIS indicates that many cultural resources could be impacted by the project (p. 183), it is important that the FS work closely with affected tribes to address those impacts and document measures that would be taken to avoid or reduce impacts to cultural resources.

Based on our review and concerns about water quality, we have assigned a rating of EC-2 (Environmental Concerns - Insufficient Information) to the Preferred Alternative (Alternative 3). A copy of the rating system used in conducting our review is enclosed for your reference.

Thank you for the opportunity to review this draft EIS. If you have questions or comments concerning our review, please contact Theo Mbabaliye at (206) 553-6322 or me at (206) 553-1601.

Sincerely,

/s/

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure

cc:

EPA Oregon Operations Office  
Oregon Department of Environmental Quality